

### REMARKS

Applicants thank the Examiner for examination of this application and withdrawal of the previous rejections.

#### **Amendments to the claims**

Applicants have amended claim 11 to incorporate features of claim 12, which has been cancelled.

Applicants also have amended all of the independent claims 1, 11, 13, 22, 27 and 32 to provide proper antecedent for "the representations". Dependent claims 7, 10, 19, 25, 30 and 35 have been amended to be consistent with the amended parent claims.

No new matter has been introduced into the application by this amendment.

#### **35 U.S.C. 102 Rejection**

The Examiner has rejected claims 1-36 under 35 U.S.C. 102(e), alleging that these claims are anticipated by Munson et al. (US Patent No. 6,741,262 B1, hereinafter called "Munson"). Applicants respectfully request reconsideration of the rejection for the reasons set out below.

#### **(1) Claims 1 and 12**

Amended claim 1 recites a colour management user interface controller that comprises a representation controller and a relation indicator controller. The representation controller presents to a user representations, each representing each of the multiple colour entities. The relation indicator controller presents to the user one or more relation indicators indicating colour relation between the multiple colour entities represented by the representations. Thus, the controller assists the user to manage colour settings of the multiple colour entities.

In contrast, Munson is directed to colour configuration of a single printing device.

Munson shows in Figures 1-4 a series of screen shots. The displays shown in Figures 1-3 are used to select a printing device for which the user wants to configure color settings. That is, Figure 1 shows a user interface of a printing device controller with a menu of feature categories 10 displayed. When the user selects a bar for accessing a color management feature 11 from the menu, the selected feature category 11 is expanded as shown in Figure 2 (column 3, lines 9-18) to provide options for standard settings and expert settings 21. When the user selects the expert settings button 21, as shown in Figure 3, a dialog box 30 is launched so that the user can enter a network address of a printing device (column 3, lines 23-26) to obtain information of the printing device. The “information is utilized to dynamically generate an expert color management settings interface unique to the specified printing device, in which the displayed color management settings and the options menus are customized to the printing device” (column 3, lines 34-39, the underlines are added). The user configures color settings for the specified printing device through the expert color management settings interface, e.g., Figure 4. Munson recognizes existing of multiple printing devices in the network, but configuration of color settings is carried out for a single specified printing device.

Figure 4 shows an exemplary expert color management settings interface which is customized to the specified printing device. The color management settings interface shows “a graphical representation of a color workflow 41 as it occurs at the printing device” (column 3, lines 53-61, the underline is added). RGB 42, CMYK 43 and the like shown in Figure 4 indicate options of configuration paths available to the user, rather than representation of multiple color entities. Directional arrows 57 shown in Figure 4 is a color workflow 41 which

includes a series of paths (column 3, line 63), along which the user selects various settings (column 4, lines 8-12). A final output is produced through a menu of Output Profiles 54 “in which the user may select a color space for the printing device” (column 4, lines 22-23, the underline is added). Directional arrows 57 does not indicate colour relation between multiple colour entities.

Munson does not disclose or suggest any user interface controller having a representation controller that presents representations, each representing each of the multiple colour entities, and a relation indicator controller that presents relation indicators indicating colour relation between the multiple colour entities as required by Applicants’ claims.

Therefore, it is respectfully submitted that the invention as recited in claim 1 is not anticipated by Munson, and thus complies with the requirements under 35 U.S.C. 102(e).

Claim 12, which has been incorporated into claim 11, recites the representation controller and the relation indicator controller. Accordingly, for the reasons set out above for claim 1, it is respectfully submitted that the invention as recited in claim 12, as incorporated into claim 11, also is not anticipated by Munson, and thus complies with the requirements under 35 U.S.C. 102(e).

Since the color management settings interface shown in Figure 4 relates to a single specified printing device, Munson does not have any motivation to present to representations of multiple color entities, or colour relation indicators between multiple color entities. Munson does not concern colour matching between multiple colour entities.

Therefore, claim 1 and claim 12 as incorporated in claim 11 are patentably distinguished from Munson.

**(2) Claims 2, 14, 23, 28 and 33**

Claims 2, 14, 23, 28 and 33 depend on claims 1, 13, 22, 27 and 32, respectively, and recite a function or step to allow the user to select a relation indicator to manage the colour relation between colour entities that correspond to the relation indicator. Claims 13, 22, 27 and 32 also contain similar limitations as claim 1. The deficiencies of Munson vis-à-vis claim 1 are discussed above. As discussed above, Munson does not provide any relation indicator or management of the colour relation between colour entities. Accordingly, Applicants respectfully submit that claims 2, 14, 23, 28 and 33 also are patentable over Munson.

**(3) Claims 3, 15, 24, 29 and 34**

Claims 3, 15, 24, 29 and 34 depend indirectly on claims 1, 13, 22, 27 and 32, respectively, and recite a function or step to change the appearance of a relation indicator when the relation indicator is selected by the user.

As discussed above, Munson does not provide any relation indicator. Accordingly, Applicants respectfully submit that these claims also are patentably distinguished over Munson.

**(4) Claims 4 and 16**

Claims 4 and 16 depend directly or indirectly on claims 1 and 13, respectively, and recite that the relation indicators are presented as arrow buttons.

As discussed above, Munson does not provide any relation indicator. Munson's arrows 57 are provided to show the workflow. Accordingly, Applicants respectfully submit that these claims also are patentably distinguished over Munson.

**(5) Claims 5 and 17**

Claims 5 and 17, depend directly or indirectly on claims 1 and 13, respectively, and recite that the colour relation indicators which are available for user's selection are presented.

As discussed above, Munson does not provide any relation indicator. Accordingly, Applicants respectfully submit that these claims also are patentably distinguished over Munson.

**(6) Claims 6 and 18**

Claims 6 and 18 depend directly or indirectly on claims 1 and 13, respectively, and recite a function or step to generate, in accordance with the relation indicator selected by the user, colour matching data indicating a colour entity whose colour settings is used for colour matching.

As discussed above, Munson does not disclose or suggest any colour matching between colour entities, or any relation indicator. Accordingly, Applicants respectfully submit that these claims also are patentably distinguished over Munson.

**(7) Claims 7, 19, 25, 30 and 35**

Claims 7, 19, 25, 30 and 35 depend directly on claims 1, 13, 22, 27 and 32, respectively, and recite a function or step to associate the representation of each of the multiple colour entities with a colour profile of the colour entity.

As discussed above, Munson does not disclose or suggest any representation of colour entities. Accordingly, Applicants respectfully submit that these claims also are patentably distinguished over Munson.

**(8) Claims 8 and 20**

Claims 8 and 20 depend indirectly on claims 1 and 13, respectively, and recite the use of a colour profile storage to obtain the colour profile of each of the multiple colour entities.

As discussed above, Munson does not disclose or suggest colour management of multiple colour entities. Accordingly, Applicants respectfully submit that these claims also are patentably distinguished over Munson.

**(9) Claim 9**

Claims 9 depends on claim 7 which in turn depends on claim 1, and recites that the representation controller has a function to present to the user the colour profile of the multiple colour entities.

As discussed above, Munson does not disclose or suggest any representation controller or colour management of multiple colour entities. Accordingly, Applicants respectfully submit that this claim also is patentably distinguished over Munson.

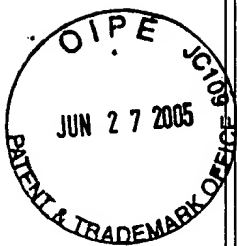
**(10) Claims 10, 21, 26, 31 and 36**

Claims 10, 21, 26, 31 and 36 depend on claims 9, 20, 25, 30 and 35, which in turn depend on claims 1, 13, 22, 27 and 32, and recite presentation of representation of a colour entity in multi levels.

As discussed above, Munson does not disclose or suggest any representation of colour entity. Accordingly, Applicants respectfully submit that these claims also are patentably distinguished over Munson.

**(11) Claim 11**

As indicated above, independent claim 11 has been amended to incorporate the limitations of claim 12. Thus, amended claim 11 is patentably distinguished over Munson for the reasons set out above.



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Amendment D

**(12) Claims 13, 22, 27 and 32**

Claims 13, 22, 27 and 32 are independent claims that recite a step or module of presenting to a user colour relation between the multiple colour entities, and controlling colour settings of the multiple colour entities.

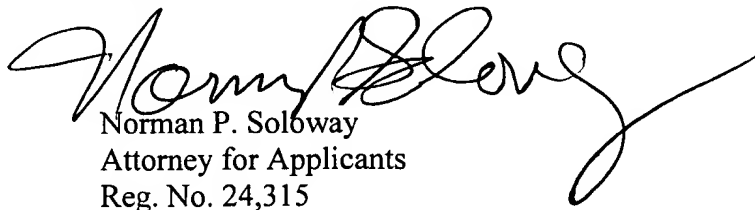
As discussed above, Munson does not disclose or suggest any presentation of relation between multiple colour entities. Accordingly, Applicants respectfully submit that these claims also are patentably distinguished over Munson.

Consequently, Applicants submit that claims 1-36 comply with the requirements under 35 U.S.C. 102(e), and that the present invention as claimed in claims 1-36 is patentably distinguished over Munson.

Having dealt with all the objections raised by the Examiner, the Application is believed to be in order for allowance. Early and favorable action are respectfully requested.


In the event there are any fee deficiencies or additional fees are payable, please charge them (or credit any overpayment) to our Deposit Account Number 08-1391.

Respectfully submitted,

  
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**CERTIFICATE OF MAILING**

I certify that this correspondence is being deposited with the United States Postal Service as First Class mail in an envelope addressed to MAIL STOP AMENDMENT, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450" on June 23, 2005 at Tucson, Arizona.

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